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FILED

Mar 31, 2022

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 JOSE MANUEL CHAVEZ ZEPEDA, and
DENIS ZACARIAS PONCE CASTILLO,
15 aka "El Ciego," "Casi Miro," and "El
Tuerto,"
16 Defendants.
17

CASE NO. 2:22-cr-0064 JAM

21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to
Distribute and to Possess with Intent to Distribute
Cocaine; 21 U.S.C. § 841(a)(1) – Distribution of
Cocaine; 21 U.S.C. § 853(a) – Criminal Forfeiture

18 I N D I C T M E N T

19 COUNT ONE: [21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Distribute and to Possess with Intent to
Distribute Cocaine]
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The Grand Jury charges: T H A T

21 JOSE MANUEL CHAVEZ ZEPEDA, and
22 DENIS ZACARIAS PONCE CASTILLO,
23 defendants herein, beginning on a date unknown to the Grand Jury, but not later than on or about April
24 22, 2016, and continuing through on or about March 16, 2022, in Sacramento County, State and Eastern
25 District of California, and elsewhere, did conspire and agree with each other and with persons known
26 and unknown to the Grand Jury to knowingly and intentionally distribute and to possess with intent to
27 distribute at least 500 grams of a mixture and substance containing a detectable amount of cocaine, a
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Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

COUNT TWO: [21 U.S.C. § 841(a)(1) – Distribution of Cocaine]

The Grand Jury further charges: T H A T

JOSE MANUEL CHAVEZ ZEPEDA, and
DENIS ZACARIAS PONCE CASTILLO,

defendants herein, on or about June 25, 2021, in Sacramento County, State and Eastern District of California, did knowingly and intentionally distribute at least 500 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

FORFEITURE ALLEGATION: [21 U.S.C. § 853(a) – Criminal Forfeiture]

1. Upon conviction of one or more of the offenses alleged in Counts One and Two of this Indictment, defendants JOSE MANUEL CHAVEZ ZEPEDA and DENIS ZACARIAS PONCE CASTILLO shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a), the following property:

a. All right, title, and interest in any and all property involved in violations of Title 21, United States Code, Section 841(a)(1), or conspiracy to commit such offenses, for which defendants are convicted, and all property traceable to such property, including the following: all real or personal property, which constitutes or is derived from proceeds obtained, directly or indirectly, as a result of such offenses; and all property used, or intended to be used, in any manner or part to commit or to facilitate the commission of the offenses.

b. A sum of money equal to the total amount of proceeds obtained as a result of the offenses, or conspiracy to commit such offenses, for which defendants are convicted.

2. If any property subject to forfeiture, as a result of the offenses alleged in Counts One and Two of this Indictment, for which defendants are convicted:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or


e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of defendants, up to the value of the property subject to forfeiture.

A TRUE BILL.

/s/ Signature on file w/AUSA

FOREPERSON



PHILLIP A. TALBERT
United States Attorney

No. _____

2:22-cr-0064 JAM

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

JOSE MANUEL CHAVEZ ZEPEDA, and
DENIS ZACARIAS PONCE CASTILLO,
aka "El Ciego," "Casi Miro," and "El Tuerto,"

I N D I C T M E N T

VIOLATION(S):

21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Distribute and to Possess with Intent to Distribute Cocaine;
21 U.S.C. § 841(a)(1) – Distribution of Cocaine;
21 U.S.C. § 853(a) – Criminal Forfeiture

A true bill,

/s/ Signature on file w/AUSA

Foreman.

Filed in open court this 31 day

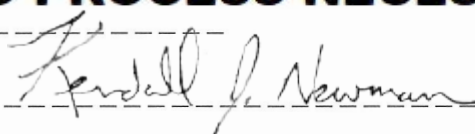
of MARCH, A.D. 20 22

/s/ Alexandra Waldrop

Clerk.

NO PROCESS NECESSARY

Bail, \$ _____



Kendall J. Newman, United States Magistrate Judge

United States v. Chavez, et al.
Penalties for Indictment

Defendants

Jose Manuel CHAVEZ Zepeda
Denis Zacarias PONCE Castillo

COUNT 1: **ALL DEFENDANTS**

VIOLATION: 21 U.S.C. §§ 846, 841(a)(1) - Conspiracy to Distribute and Possess with Intent to Distribute at least 500 grams of a Mixture and Substance containing Cocaine

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of up to 40 years in prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 2: **ALL DEFENDANTS**

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of at least 500 grams of a Mixture and Substance containing Cocaine

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of up to 40 years in prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

FORFEITURE ALLEGATION: **ALL DEFENDANTS**

VIOLATION: 21 U.S.C. § 853(a) - Criminal Forfeiture

PENALTIES: As stated in the charging document